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March 26, 2020

BY ECF

The Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

**Re: Fasanello v. United Nations International School,
Case No. 19-cv-05281 (GHW)**

Dear Judge Woods:

We represent Plaintiff Joseph Fasanello ("Plaintiff") in the above-referenced employment matter against Defendant United Nations International School ("Defendant"). In compliance with this Court's Case Management Order and this Court's November 14, 2019 Order [Dkt. No. 27], we write now to respectfully request a brief, one-week modification of the schedule for expert discovery, for the reasons set forth below. Counsel for Defendant, Douglas Klein, Esq., consents to this request.

By way of background, Plaintiff has retained two experts: A vocational expert, Dr. Dan Wolstein, and an economist, Kristin Kucsma, PhD. We have received Dr. Wolstein's expert report today, and we will therefore file our Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2), related to same, in a timely manner. However, Ms. Kucsma has advised that she needs an additional week to complete her expert report. Accordingly, we respectfully request the following brief modification of the expert discovery schedule:

	Current Deadline	Proposed Deadline
Plaintiff's Expert Disclosures	April 1, 2020	April 8, 2020
Defendant's Expert Disclosures	April 15, 2020	April 22, 2020


Based on the foregoing, we respectfully request a one-week modification of the expert discovery schedule, as set forth herein.

We thank the Court for its attention to this matter.

Application granted. The deadline for Plaintiff's expert disclosures is extended from April 1, 2020 to April 8, 2020. The deadline for Defendant's expert disclosures is extended from April 15, 2020 to April 22, 2020. Except as expressly modified by this order, the case management plan entered by the Court on October 7, 2019, Dkt. No. 19, and modified on November 14, 2019, Dkt. No. 27, remains in full force and effect.

SO ORDERED.

Dated: March 27, 2020
New York, New York


GREGORY H. WOODS
United States District Judge

Respectfully submitted,


Chaya M. Gourarie, Esq.